

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 V.) CRIMINAL NO. 05-10250-NG
)
DANIELLE VANESSA PAPPARGERIS)

JOINT MOTION OF THE PARTIES TO CONTINUE SENTENCING

The parties jointly move that the sentencing in this matter, currently scheduled for February 15, 2007, be continued for 60 days, until the middle or end of April 2007. As grounds therefor, the parties state that the defendant pled guilty to an information pursuant to a plea agreement that contains a cooperation provision. A pre-plea PSR has now been prepared in the case in which the Ms. Pappargeris is cooperating, but it is not yet known whether a plea or trial will result, but a plea hearing or trial date is expected to be set within the next 60 days. Accordingly, the government is not yet in a position to accurately describe the extent and helpfulness of the defendant's cooperation, and believes, as does the defendant, that the sentencing in this case should be continued until the extent of the defendant's cooperation is more fully developed.

DANIELLE VANESSA PAPPARGERIS
By Her Attorney

MICHAEL J. SULLIVAN
United States Attorney

By:

/s/ Walter H. Underhill
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February 12, 2006